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November 28, 2022

Via ECF

Hon. Judge Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Gu Seon Song v. Shinhan Bank America (21-cv-11207)

Dear Honorable Judge Engelmayer,

This firm represents Plaintiff in the above-referenced action. We write this letter to request this Court to schedule a conference to resolve a dispute over Defendant's designation of Confidential Material for the following documents:

1. Shinhan Bank America's Audit Committee Special Meeting Minutes dated March 16, 2022 (DEF000101-DEF000181) (See *Exhibit A*); and
2. Shinhan Bank America's Board of Directors Special Meeting Minutes dated March 16, 2022 (DEF000038-000039) (See *Exhibit B*)

Since Plaintiff does not agree with Defendant's designation of Confidential Material for the two above-referenced documents, Plaintiff's counsel served a Challenge Letter on Defendant's counsel on October 21, 2022 ("Challenge Letter"). A copy of the Challenge Letter is Attached as *Exhibit C*. Ever since Plaintiff's counsel served the Challenge Letter on Defendant's counsel, Plaintiff's counsel has attempted to amicably resolve this matter numerous times over the phone and email. Most recently, Plaintiff had a meet and confer session with Defendant's counsel, Mr. Vincent Avery on November 18, 2022 to discuss this matter. During the meet and confer session, Defendant counsel represented that he would speak to Defendant about this matter and would inform Plaintiff's counsel of Defendant's position by November 21, 2022. However, Plaintiff's counsel has not received any response from Defendant's counsel as of today.

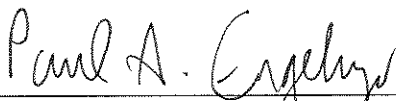
Paragraph 5 of the Confidentiality Stipulation and Protective Order granted by Your Honor on October 17, 2022 (Doc. No. 27) states that “In the event a party challenges another party’s designation of confidentiality, counsel shall make a good faith effort to resolve the dispute, and in the absence of a resolution within 5 business days, the challenging party may seek resolution by the Court.” A copy of the Confidentiality Stipulation and Protective Order is attached as *Exhibit D*. Since the parties have been unable to resolve this dispute within 5 business days after Plaintiff challenged Defendant’s designation of Confidential Material, Plaintiff respectfully requests a conference in order to resolve this dispute.

Furthermore, pursuant to Your Honor’s Individual Rule 4.B.2, Plaintiff respectfully requests permission to temporarily file *Exhibit A* and *Exhibit B* of this letter motion under seal until the Court determines whether *Exhibit A* and *Exhibit B* of this letter motion should be designated as Confidential Material.

Thank you for your time and consideration of this request.

Respectfully submitted,
/s/ Henry Hong Jung, Esq.

The Court has received plaintiff’s counsel’s letter, and orders defendant to file a response, if any, by December 2, 2022. SO ORDERED.

A handwritten signature in cursive script, reading "Paul A. Engelmayer", written over a horizontal line.

PAUL A. ENGELMAYER
United States District Judge
November 30, 2022